

HOFLAND & TOMSHECK

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Attorney for Defendant Hamblin

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

RUSSELL HAMBLIN,

Defendant.

Case No.: 2:06-CR-00369-JCM-RJJ

**STIPULATION AND ORDER TO
CONTINUE REVOCATION HEARING
(SIXTH REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Assistant United States Attorney Supriya Prasad, counsel for the United States of America, and Jason F. Carr, esq., counsel for Defendant RUSSELL HAMBLIN, that the revocation hearing currently scheduled for March 17, 2023 at 10:30 a.m. be continued to a date and time convenient to the Court but not less than forty-five days.

This stipulation is entered into for the following reasons:

1. This is the sixth revocation continuance request but the first request initiated by current defense counsel.
2. That resolving this matter is complicated by the fact a new federal criminal case is proceeding concurrently in District of Nevada case number 2:22-cr-00249-RFB-NJK.
3. That on November 28, 2022, Mr. Hamblin pleaded guilty in that case, pursuant to a written plea agreement. (*See* ECF No. 7 (minutes of proceeding).) The written plea contemplates that the revocation sentence in this matter will run concurrent

to the stipulated ten-year sentence in 2:22-cr-00249-RFB-NJK. (See ECF No. 6 at 12, ¶ 18.)

4. That on March 2, 2023, this Court appointed the undersigned defense counsel. On February 10, 2023, the court in 2:22-cr-00249-RFB-NJK also appointed the undersigned.
5. That on March 3, 2023, counsel met with Mr. Hamblin at the Nevada Southern Detention Center to determine Mr. Hamblin's litigation goals and to discuss the matter.
6. That, during that meeting, defense counsel ascertained that Mr. Hamblin would need to review portions of his discovery he does not currently possess.
7. That defense counsel is also reviewing the discovery and case law as a result of his conversation with Mr. Hamblin.
8. That Mr. Hamblin and defense counsel respectfully ask for time to cogently decide how to proceed in both cases.
9. For the above stated reasons, the parties agree that a continuance of the revocation proceeding is appropriate.

DATED this 14th day of March, 2023.

Respectfully submitted,

HOFLAND & TOMSHECK

JASON M. FRIERSON
United States Attorney

/s/ Jason F. Carr
JASON F. CARR, ESQ.
Counsel for Defendant
RUSSELL HAMBLIN

/s/ Supriya Prasad
SUPRIYA PRASAD
Assistant United States Attorney

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UNITED STATES OF AMERICA

Case No.: 2:06-cr-00369-JCM-RJJ

Plaintiff,

vs.

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Defendant.

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. This is the sixth revocation continuance request but the first initiated by current defense counsel.
2. That resolving this matter is complicated by the fact a new federal criminal case is proceeding concurrently in District of Nevada case 2:22-cr-00249-RFB-NJK.
3. That on November 28, 2022, Mr. Hamblin pleaded guilty in that case pursuant to a written plea agreement. (*See* ECF No. 7 (minutes of proceeding).) The written plea contemplates that the revocation sentence in this matter will run concurrent to the stipulated ten-year sentence in 2:22-cr-00249-RFB-NJK. (*See* ECF No. 6 at 12, ¶ 18.)

1 4. That on March 2, 2023, this Court appointed the undersigned defense counsel.
2 On February 10, 2023, the court in 2:22-cr-00249-RFB-NJK also appointed the
3 undersigned.
4 5. That on March 3, 2023, counsel met with Mr. Hamblin at the Nevada Southern
5 Detention Center to determine Mr. Hamblin's litigation goals and discuss the
6 matter.
7 6. That, during that meeting, defense counsel ascertained that Mr. Hamblin
8 would need to review portions of his discovery he does not currently possess.
9 7. That defense counsel is also reviewing the discovery and case law as a result
10 of his conversation with Mr. Hamblin.
11 8. That Mr. Hamblin and defense counsel respectfully ask for time to determine
12 how to proceed in both cases.
13 9. For the above stated reasons, the parties agree that a continuance of the
14 revocation proceeding is appropriate.
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ORDER

Based on the foregoing Findings of Fact and for good cause shown IT IS HEREBY ORDERED, that the Supervised Release Revocation Hearing currently scheduled for March 17, 2023 at 11:00 a.m. be continued to **May 3, 2023, 10:00 a.m.**

DATED March 15, 2023.


UNITED STATES DISTRICT JUDGE

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